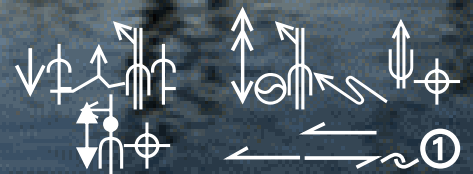
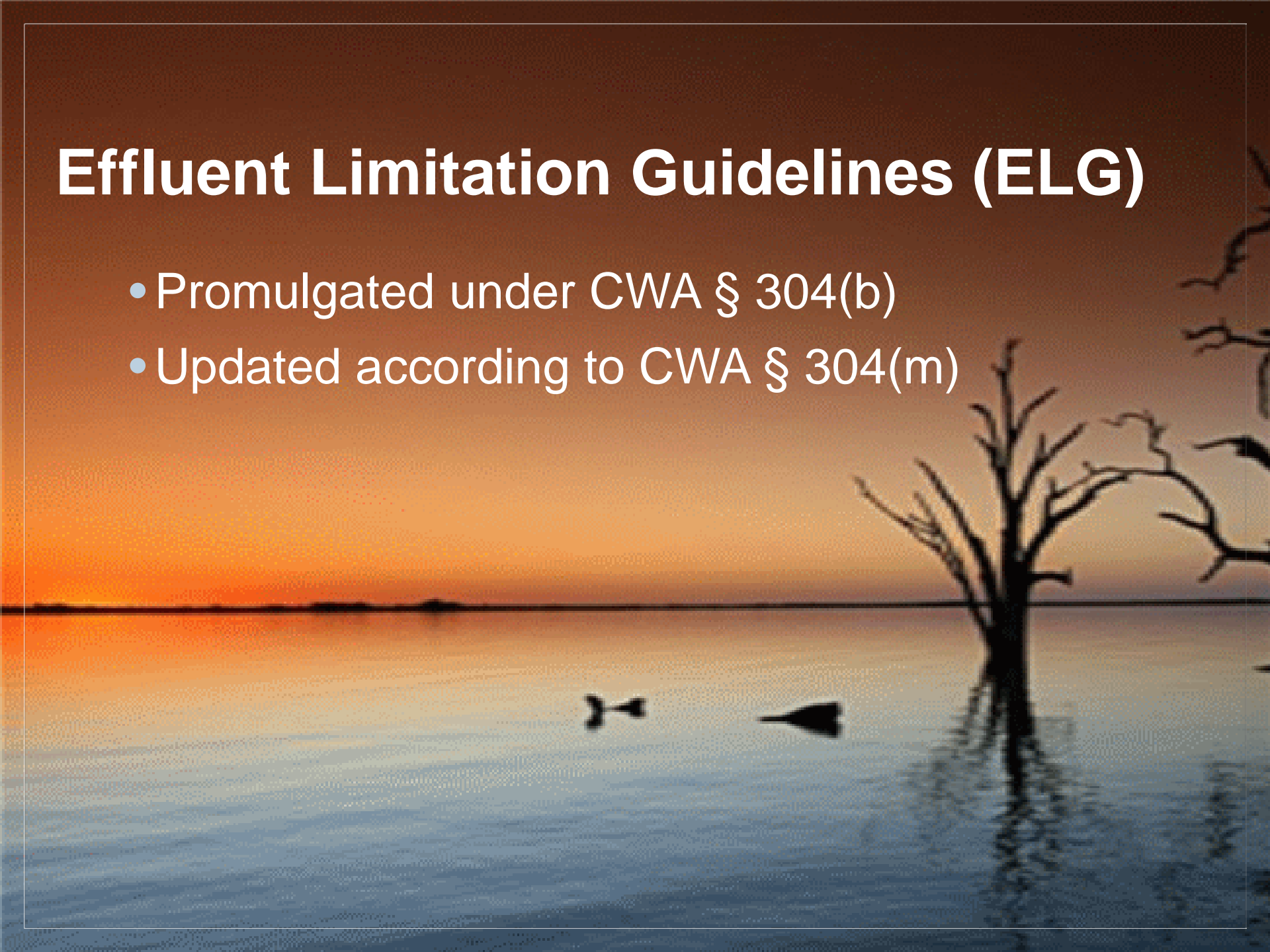


Effluent Limitation Guidelines & Technology-based Effluent Limitations



Effluent Limitation Guidelines (ELG)

- Promulgated under CWA § 304(b)
- Updated according to CWA § 304(m)



ELGs apply to 3 facility types:

- Existing facilities (Direct Dischargers)
 - best practicable technology (BPT),
 - best available technology (BAT), or
 - best conventional pollutant control technology (BCT);
- Existing facilities (Indirect Dischargers)
 - pretreatment standards for existing sources (PSES);
- New sources (either direct or indirect)
 - New Source Performance Standards (NSPS) or
 - Pretreatment Standards for New Sources (PSNS).

ELGs:

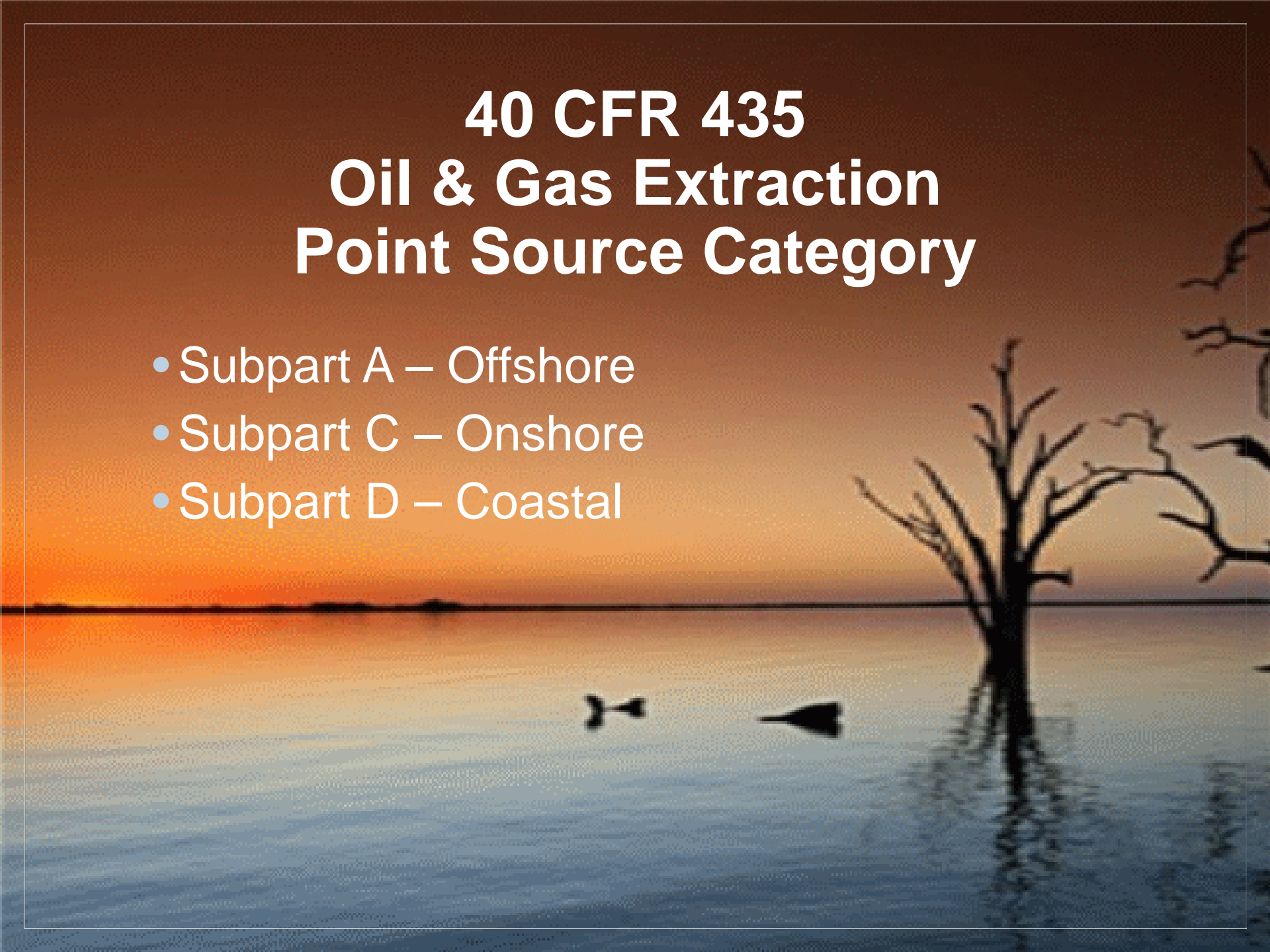
- Address specific industrial categories.
- Specify the maximum levels of pollutants that may be discharged
- Each facility within an industrial category or subcategory must generally comply with the applicable discharge limits
- EPA conducts an assessment of
 - the performance of the best pollution control technologies or pollution prevention practices available for an industrial category or subcategory as a whole; and
 - the economic achievability of that technology, (can consider costs, benefits, and affordability of achieving the reduction in pollutant discharge.)

40 CFR 435

Oil & Gas Extraction

Point Source Category

- Subpart A – Offshore
- Subpart C – Onshore
- Subpart D – Coastal



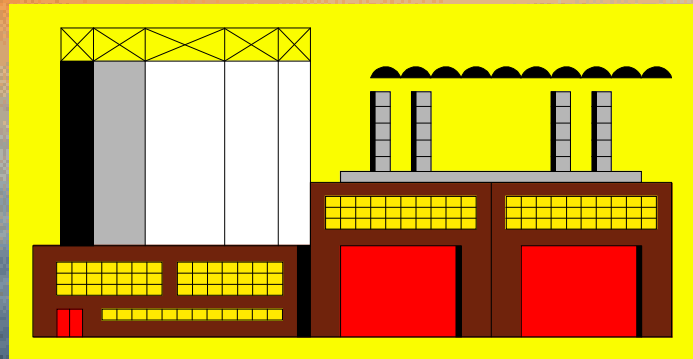
Exemption Considerations

- Geology amenable to grinding and injection does not appear to occur throughout Cook Inlet
 - ADD UIC STATS
- Extremely limited near-by land disposal options
 - Oregon, Idaho



Technology-based Effluent Limitations

- Incorporate ELGs into a permit
- If no ELG, TBELs can be developed based on Best Professional Judgement (40 CFR 125.3(c))



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